

September 1, 2020

Ms. Christine E. Long  
Registrar and Board Secretary  
Ontario Energy Board  
2300 Yonge St., Suite 2700  
Toronto, ON M4P 1E4

**RE: NOTICE OF REVISED PROPOSAL TO AMEND THE STANDARD SUPPLY SERVICE CODE  
FILE NO. EB-2020-0152**

Dear Ms. Long:

Hydro Ottawa Limited (HOL) appreciates the opportunity to provide further comment on the revised proposed amendments to the Standard Supply Service Code in relation to the introduction of Rate Optionality.

HOL wishes to offer the comments with respect to the following sections:

### **Section 3.5.5 (Consumer Notification)**

Within 10 business days of receiving a notice referred to in section 3.5.1 that is not incomplete or otherwise deficient, a distributor shall notify the RPP consumer as to when the distributor will begin charging the consumer tiered prices under section 3.3. This notification shall specify:

- (a) the calendar date on which the RPP consumer will start to be charged tiered prices, or
- (b) if it is not practicable to specify the calendar date, the notification shall refer to the applicable **billing period**, in which case the distributor shall also provide or refer the RPP consumer to information that explains how the RPP consumer can ascertain when that billing period will begin.

### Comments

The proposed consumer notification of the pricing switch date, per section 3.5.5(a) would require new logic to be incorporated into HOL's CIS system. To add such functionality at this time would add costs, complexity and put the October 13<sup>th</sup> implementation deadline at potential risk. Further, it could lead to an unsatisfactory customer experience and related inquiries. If the date could be provided, there may still be potential risk that the actual date could change, for unforeseen reasons.

Similar to the default process outlined in section 3.5.5(b), Hydro Ottawa proposes to provide the billing month based on the CIS system generated billing schedule. For example: "Your December 2020 bill period will reflect your new rate plan".

### Section 3.5.8 (Informing Consumer of Rate Optionality)

A distributor shall inform a consumer that has an eligible time-of-use meter of the option like to be charged either tiered prices under section 3.3 time-of-use prices under section 3.4 and provide the consumer an opportunity to elect one of those options, before:

- (a) opening a new account for an RPP consumer; or
- (b) charging prices under section 3.3 or 3.4 to an electing spot consumer that notifies the distributor under section 3.2.6 that the consumer no longer wishes to be charged spot market prices under section 3.2.2.

The distributor shall ensure that the first bill issued to the consumer after the account is opened, or the first bill issued to the consumer after the last bill issued to the consumer under spot market prices under section 3.2.2, or the change is implemented reflects the price structure chosen by the consumer, or if none is chosen, reflects time-of-use prices. Sections 3.5.2 to 3.5.7 do not apply in respect of an election under this section 3.5.8.

#### Comments

HOL appreciates OEB's support to simplify the process by eliminating the bill message and Retailer drop scenarios.

With reference to Other Account Changes, such as Landlord Reversion Agreements, Hydro Ottawa wishes to identify the following constraints.

#### *Landlord Reversion*

The initial set up for Landlord Reversions is currently a manual process which does not support the selection of a pricing plan during set up. Once set up, the process of reverting from tenant to landlord is an automated process at HOL. As such, there is no opportunity to select a rate option. Landlords normally assume responsibility for units during short periods of time. HOL believes that the level of effort, cost and risk to incorporate the proposed functionality outweighs any potential benefit to landlords.

If the OEB proceeds as proposed, Hydro Ottawa recommends that the rate selection for the landlord must be applicable to the entire building, only, at initial set up time.

Unit-specific pricing options within the same building would not be feasible in our CIS system. Given that the landlord reversion process is automated, this would involve a logic change to flag which rate the landlord selected for the building in question for vacancies within tenancy units. This will add complexities to the process on an already extremely tight timeline.

### Section 3.5.12 (Information for Consumers)

A distributor shall provide to consumers or otherwise make available such information in respect of the option to elect to be charged tiered prices under section 3.3 rather than time-of-use prices under section 3.4 as may be approved or directed by the Board.

#### Comments

Hydro Ottawa recognizes the critical importance of having timely and accurate information available to consumers so they can make informed decisions regarding their pricing options. In order to support this goal, effective collaboration and co-ordination between the OEB and distributor communication materials is necessary to ensure the support tools are in place prior to October 13<sup>th</sup>. In order to provide sufficient time for implementation, the customer information tools (including November 1 rates) need to be finalized (in both official languages) and delivered to HOL, no later than October 2<sup>nd</sup> to allow time for HOL to incorporate the materials into our customer education and communications strategy, as well as, give customers ample time to get informed, assess and make a decision that fits their needs prior to November 1st.

HOL supports rate optionality and its importance to customers. In order to effectively meet the needs of our customers and business during this implementation phase, it is crucial that our business processes and customers' needs and expectations are appropriately aligned.

We appreciate the ongoing consultative efforts of the OEB to enable distributor feedback as this unprecedented implementation continues to evolve.

Should you have any questions, please do not hesitate to contact us.

Sincerely,

**Greg Van Dusen**  
**Director, Regulatory Affairs/Directeur, Affaires réglementaires**

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